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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

U.S. DISTRICT COURT
DISTRICT OF MASS

CIVIL ACTION

George Logue

Plaintiff

v.

Experian, Inc.

Defendants

Case No.

COMPLAINT FOR DAMAGES

Violation Fair Credit Reporting Act

(UNLIMITED CIVIL CASE)

Comes now the plaintiff, who submits this complaint to this Court for violations of The Fair Credit Reporting Act (FCRA).

Plaintiff alleges:

Parties

1. Plaintiff is currently a resident of Middlesex County, Massachusetts and a citizen of the United States.
2. Defendant Credit Reporting Agency and at all times herein mentioned was, an entity organized and existing under the laws of the United States of America, and was engaged in the business of gathering, processing, and providing credit information about individuals, and to qualified recipients.
3. Plaintiff is ignorant of all names and capacities of individual defendants working in the Agency sued herein, inclusive, and therefore addresses each defendant by addressing The Agency maintains a corporate office at Experian, 475 Anton Blvd., Costa Mesa, CA 92626. Plaintiff will amend this complaint to allege additional names and capacities when ascertained. Plaintiff is informed and believes and thereon alleges that each of the defendants is responsible in some manner for the occurrences herein alleged, and that plaintiff's injuries as herein alleged were proximately caused by their and The Agency's conduct.
4. Defendant Agency and it's agents, at all times herein mentioned were the agents and employees of Experian and in doing these things hereinafter alleged were acting within the course and scope of Experian. Plaintiff is informed, believes, and thereon alleges that each and every one of the illegal acts of defendants complained of herein was done under the instructions and approval, express or implied, of the Agency.

Jurisdiction

5. This Court has jurisdiction in this matter pursuant to 15 U.S.C. § 1681 et seq. and § 618 where an action to enforce any liability created under this title may be brought in any appropriate United States district court without regard to the amount in controversy.

Facts


6. Plaintiff, being financially sound, had enjoyed a good financial reputation and had been able to procure credit from banks for years prior to the period of this incident. During this period, plaintiff possessed two accounts with two different banks.
7. During or about the Summer of 2002, and several times thereafter, the defendant, its agents and servants, falsely, recklessly and maliciously published a credit report of and concerning the plaintiff which grossly exaggerated the liabilities of the plaintiff, and greatly misrepresented and minimized the assets of the plaintiff, therefore, without any reasonable grounds. Further, upon notification of corrections, including first and foremost plaintiff's correct address, defendant refused and continues to refuse to make such corrections or update plaintiff's account thereby maliciously and oppressively causing plaintiff difficulties, in accessing and obtaining information on his account, and, further by continuing to release such false information at any time it chooses.
8. Because of the false and defamatory statements contained in report, the plaintiff has been unable to obtain credit from some banks with which he formerly did business, and further, he was severely and undeniably damaged in his reputation and business.

WHEREFORE, plaintiff prays for judgment as follows:

1. For general and punitive damages according to proof;
2. For incidental expenses according to proof;
3. For reasonable consulting attorney's fees;
4. For interest and as allowed by law;
5. For costs of suit herein incurred; and
6. For such other and further relief as the court may deem proper.

August 9, 2004

Date


Signature of Plaintiff/Appearing Pro Se